



STATE OF RHODE ISLAND

SUPERIOR COURT

SUMMONS

Plaintiff Christopher Laccinole v. THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID Defendant	Civil Action File Number WC-2021-0490 Attorney for the Plaintiff or the Plaintiff Christopher Laccinole Address of the Plaintiff's Attorney or the Plaintiff 23 Othmar St Narragansett RI 02882
McGrath Judicial Complex Washington County 4800 Tower Hill Road Wakefield RI 02879 (401) 782-4121	Address of the Defendant Corporation Service Company 222 Jefferson Boulevard Suite 200 Warwick RI 02888

TO THE DEFENDANT, The Narragansett Electric Company D/b/a National Grid:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 11/1/2021.	/s/ Brenden Oates Clerk
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Witness the seal/watermark of the Superior Court

11/2/21

True Copy Attest
 Jacqueline Alger
 Constable # 6210



**STATE OF RHODE ISLAND
SUPERIOR COURT**

Plaintiff

Christopher Laccinole

v.

THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID

Defendant**Civil Action File Number**

WC-2021-0490

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID, by delivering or leaving said papers in the following manner:

☐ With the Defendant personally.

☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person of suitable age and discretion _____

Address of dwelling house or usual place of abode _____

Age _____

Relationship to the Defendant _____

☒ With an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ With a guardian or conservator of the Defendant.

Name of person and designation _____

☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.

☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.

Name of person and designation _____



STATE OF RHODE ISLAND
SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: Nov 2 2021
Month Day Year

SERVICE FEE \$ 46

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE _____

Jacqueline Alger
Constable # 6210
P.O. Box 284
East Greenwich, RI 02818

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was _____ to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____

**STATE OF RHODE ISLAND
WASHINGTON COUNTY**

SUPERIOR COURT

CHRISTOPHER LACCINOLE
Plaintiff

C.A. No.:

Vs.

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a NATIONAL GRID**
Defendant

JURY TRIAL REQUESTED

COMPLAINT

INTRODUCTION

1. This is Plaintiff's third consumer protection action against National Grid for robocalling Plaintiff with prerecorded messages.
2. Since 2013, Plaintiff sent SEVEN certified letters to National Grid, return receipt requested, telling National Grid each time, "Please don't call me."
3. Even though National Grid signed for receipt of each of these seven letters, National Grid continues to robocall Plaintiff for years with prerecorded voice messages.
4. In several of these messages, National Grid was soliciting products and services.
5. This latest suit follows Plaintiff's two earlier suits in this Court (WC-2018-0328 and WC-2014-0519) that complained of the same conduct by National Grid.
6. Just a few days before filing the instant matter, National Grid settled a \$37.5Million robocall class action suit where National Grid placed unwanted prerecorded calls to consumers for over ten years. (see *Jenkins v. National Grid USA et al*; Eastern District New York; 2:15-cv-01219; Unopposed motion for class action settlement filed October 29, 2021).
7. The Plaintiff brings this action alleging the Defendants repeatedly violated the

Telephone Consumer Protection Act, 47 U.S.C. § 227 (hereinafter “TCPA”), while attempting to collect an alleged debt from the Plaintiff. The Plaintiff seeks statutory damages and injunctive relief under the TCPA.

8. Any violations by Defendants were knowing, willful, repeated, and intentional, and Defendants did not maintain procedures reasonably adapted to avoid any such violation.

JURISDICTION AND VENUE

9. This Court has jurisdiction to hear the TCPA claims in this matter pursuant to 47 U.S.C. § 227(b)(3) and 47 U.S.C. § 227(c)(5). See *Mims v. Arrow Fin. Servs., LLC*, 132 S. Ct. 740 (2012).
10. Venue in this County is proper pursuant to 47 U.S.C
11. . § 227(b)(3) because the Plaintiff is a resident of this County and the conduct complained of took place in this County.

PARTIES

12. The Plaintiff is an adult resident, of the Town of Narragansett, County of Washington, State of Rhode Island.
13. Upon information and belief, Defendant Narragansett Electric Company d/b/a National Grid. (hereinafter “National Grid”) is a utility incorporated under the laws of the State of Rhode Island.
14. Upon information and belief, Defendant National Grid may be served upon its registered agent in the State of Rhode Island, to wit: Corporation Service Company at 222 Jefferson Boulevard, Suite 200, Warwick, RI 02888.
15. Defendant National Grid is a subsidiary of National Grid PLC, an international

utility provider.

16. Other defendants may be discovered in the course of litigation, and Plaintiff respectfully prays that the Court will permit the addition of later discovered parties upon motion.

FACTUAL ALLEGATIONS

Plaintiff's first Do-Not-Call Letter

17. On November 29, 2013, Plaintiff mailed a letter to National Grid via US Certified Return Receipt Requested Mail (USPS tracking number 7012 0470 0001 5313 7966).
18. National Grid received and signed for this letter on December 2, 2013 with a hand-written signature that reads as "REED."
19. A true and accurate copy of the letter and receipts for mailing are attached to this complaint herein as Exhibit A.
20. That in the afore-mentioned letter, Plaintiff made certain requests of National Grid, *inter alia*, "Please don't call me."

Plaintiff's second Do-Not-Call Letter

21. On June 30, 2015, Plaintiff mailed a letter to National Grid via US Certified Return Receipt Requested Mail (USPS tracking number 7015 0640 0004 4041 7126).
22. National Grid received and signed for this letter on July 7, 2015 with a hand-written signature.
23. A true and accurate copy of the letter and receipts for mailing are attached to this complaint herein as Exhibit B.
24. That in the afore-mentioned letter, Plaintiff made certain requests of National Grid, *inter alia*, "Please don't call me."

Plaintiff's third Do-Not-Call Letter

25. On May 11, 2018, Plaintiff mailed a letter to National Grid via US Certified Return Receipt Requested Mail (USPS tracking number 7015 0640 0004 0802 5950).
26. National Grid received and signed for this letter on May 15, 2018 with a handwritten signature that reads as "AMO NATIONAL GRID."
27. A true and accurate copy of the letter and receipts for mailing are attached to this complaint herein as Exhibit C.
28. That in the afore-mentioned letter, Plaintiff wrote to National Grid, "Dear National Grid, Please don't call me."

Plaintiff's fourth Do-Not-Call Letter

29. On December 18, 2018, Plaintiff mailed a letter to National Grid via US Certified Return Receipt Requested Mail (USPS tracking number 7018 1130 0000 5140 0922).
30. National Grid received and signed for this letter on December 20, 2018 with a handwritten signature that reads as "R. Perry."
31. A true and accurate copy of the letter and receipts for mailing are attached to this complaint herein as Exhibit D.
32. That in the afore-mentioned letter, Plaintiff wrote to National Grid, "Dear National Grid, Please don't call me."

National Grid robocalls Plaintiff with prerecorded voice calls

33. At all times relevant to this Complaint, National Grid was engaged in the business of consumer electric service, using mail and telephone to communicate with residents of Rhode Island.
34. On December 29, 2018, Plaintiff received a call on his cellular telephone ending in

0762.

35. When Plaintiff answered the call, he began to immediately hear a prerecorded voice message that says, "This is National Grid, we are trying to reach Chris Laccinole. If you are Chris Laccinole, please press 1 and wait for an operator."
36. Plaintiff recognized that the message was a prerecorded voice because he has heard the exact same message before and the voice uses the same words, rhythm, pauses, and intonation each time he hears the message.
37. For more than one year after receiving Plaintiff's Fourth Do-Not-Call letter, National Grid repeatedly made and/or initiated prerecorded telephone calls to Plaintiff's cellular telephone number ending in 0762.
38. During several calls, National Grid played a prerecorded telemarketing message where it advertised products and services:

Hello, this is DeMaris calling from National Grid with an important message. You're invited to a local customer assistance expo where you can learn about options to help manage your energy bill. Please join us on Wednesday November 6th from 12pm to 4pm at the North Kingstown Library located at 100 Boon Street, North Kingstown. Our customer advocates will be at the expo to assist you with the discount rates, payment plans, the budget plans, and the forgiveness program for those that qualify. When enrolled on a discount rate, income eligible customers may qualify for up to 25 to 30 percent off monthly energy bills. If you receive SNAP or Medicaid, please make sure to bring your benefit card to the expo to enroll in our discount rate if you are not already on it. If you have been approved for field assistance, please bring your approval letter to see if you qualify for our forgiveness program. Please press three to confirm your attendance at this upcoming expo. Note you may still attend without confirming.

39. When National Grid called using this telemarketing message, it would play the exact same message above twice, leaving no doubt that it was prerecorded.

Plaintiff's fifth Do-Not-Call Letter

40. On January 4, 2020, Plaintiff mailed a letter to National Grid via US Certified Return Receipt Requested Mail (USPS tracking number 7019 0140 0000 3357 9041).

41. National Grid received and signed for this letter on January 7, 2020 with a handwritten signature.
42. A true and accurate copy of the letter and receipts for mailing are attached to this complaint herein as Exhibit E.
43. That in the afore-mentioned letter, Plaintiff wrote to National Grid, “Dear National Grid, Please don’t call me.”
44. Despite five clear and unambiguous written do-not-call requests from Plaintiff, National Grid continued to robocall Plaintiff with prerecorded voice calls to Plaintiff’s cellular telephone.

Plaintiff’s sixth Do-Not-Call Letter

45. On July 24, 2020, Plaintiff mailed a letter to National Grid via US Certified Return Receipt Requested Mail (USPS tracking number 7019 2280 0000 4947 5000).
46. National Grid received and signed for this letter on January 27, 2020.
47. A true and accurate copy of the letter and receipts for mailing are attached to this complaint herein as Exhibit F.
48. That in the afore-mentioned letter, Plaintiff wrote to National Grid, “Dear National Grid, Please don’t call me.”
49. Despite six clear and unambiguous written do-not-call requests from Plaintiff, National Grid continued to robocall Plaintiff with prerecorded voice calls to Plaintiff’s cellular telephone.

Plaintiff’s seventh Do-Not-Call Letter

50. On September 16, 2020, Plaintiff mailed a letter to National Grid via US Certified Return Receipt Requested Mail (USPS tracking number 7020 1810 0001 1106 1340).

51. National Grid received and signed for this letter on September 18, 2020.
52. A true and accurate copy of the letter and receipts for mailing are attached to this complaint herein as Exhibit G.
53. That in the afore-mentioned letter, Plaintiff wrote to National Grid, "Dear National Grid, Please don't call me."
54. Despite seven clear and unambiguous written do-not-call requests from Plaintiff, National Grid continued to robocall Plaintiff with prerecorded voice calls to Plaintiff's cellular telephone.
55. National Grid did not have the prior express consent of Plaintiff to initiate telephone calls to his cellular telephone number using an artificial or prerecorded voice to deliver a message. In fact, Plaintiff explicitly denied consent in previous correspondence to National Grid.
56. Defendant knowingly and/or willfully initiated artificial or prerecorded voice telephone calls to Plaintiff's cellular telephone number.
57. The telephone calls to Plaintiff's cellular telephone number were not initiated by accident or mistake.
58. The telephone calls to Plaintiff's cellular telephone number were an attempt to collect a debt.
59. The telephone calls to Plaintiff's cellular telephone number were not initiated for an emergency purpose.
60. It was the intent of National Grid to initiate the telephone calls to the Plaintiff's cellular telephone number.
61. The sole purpose of the continuing robocalls on the account was to harass and

intimidate Plaintiff into paying a debt.

62. Plaintiff is a person as that term is defined by 47 U.S.C. § 153(39).
63. Defendant is a person as that term is defined by 47 U.S.C. § 153(39).
64. Plaintiff's phone number is part of the national Do Not Call registry.
65. The robocalls were annoying, abusive, and harassing to Plaintiff.
66. Plaintiff incurred actual damages as a result of Defendant's behavior.
67. Defendant's calls harmed Plaintiff by causing the very harm that Congress sought to prevent—a "nuisance and invasion of privacy."
68. Defendant's calls harmed Plaintiff by trespassing upon and interfering with Plaintiff's rights and interests in Plaintiff's cellular telephone.
69. Defendant's calls harmed Plaintiff by trespassing upon and interfering with Plaintiff's rights and interests in Plaintiff's cellular telephone line.
70. Defendant's calls harmed Plaintiff by intruding upon Plaintiff's seclusion.
71. Defendants harassed Plaintiff by incessantly calling Plaintiff's telephone.
72. Defendant's calls harmed Plaintiff by causing Plaintiff aggravation and annoyance.
73. Defendant's calls harmed Plaintiff by wasting Plaintiff's time.
74. Defendant's calls harmed Plaintiff by depleting the battery life on Plaintiff's cellular telephone.
75. Defendant's calls harmed Plaintiff by using data storage space in Plaintiff's cellular telephone.
76. Defendant's calls to Plaintiff invaded the privacy interests that the TCPA was intended to protect.

COUNT I – Telephone Consumer Protection Act – 47 U.S.C. § 227(b)(1)(A)(iii)

77. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
78. Defendants' violations of the TCPA include, but are not limited to, the following:
- Making and/or initiating a telephone call using an automatic telephone dialing system or an artificial or prerecorded voice to any telephone number assigned to a cellular telephone service, in violation of 47 U.S.C. § 227(b)(1)(A)(iii).
79. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 for each such violation and an injunction prohibiting future conduct in violation of the TCPA.
80. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for "each such violation" pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from calling Plaintiff using prerecorded voice.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT II – Telephone Consumer Protection Act – 47 CFR § 64.1200(a)(1)(iii)

81. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
82. Defendants violated regulations of the TCPA including, but not limited to, the following:

No person or entity may use an automatic telephone dialing system or an

artificial or prerecorded voice to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call.

47 CFR § 64.1200(a)(1)(iii).

83. Defendants called Plaintiff's cellular telephone with prerecorded voice for years.
84. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
85. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from calling Plaintiff using prerecorded voice.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT III – Telephone Consumer Protection Act – 47 CFR § 64.1200(a)(2)

86. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
87. Defendants violated regulations of the TCPA including, but not limited to, the following:

No person or entity may initiate, or cause to be initiated, any telephone call that includes or introduces an advertisement or constitutes telemarketing, using an automatic telephone dialing system or an artificial or prerecorded voice, to any of the lines or telephone numbers described in paragraphs (a)(1)(i) through (iii) of this section.

47 CFR § 64.1200(a)(2).

88. Defendants damaged Plaintiff by calling his cellular phone with prerecorded telemarketing messages.
89. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
90. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing with prerecorded messages.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT IV – Telephone Consumer Protection Act – 47 CFR § 64.1200(b)(3)

91. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
92. Defendants violated regulations of the TCPA including, but not limited to, the following:

In every case where the artificial or prerecorded voice telephone message includes or introduces an advertisement or constitutes telemarketing and is delivered to a residential telephone line or any of the lines or telephone numbers described in paragraphs (a)(1)(i) through (iii), provide an automated, interactive voice- and/or key press-activated opt-out mechanism for the called person to make a do-not-call request.

47 CFR § 64.1200(b)(3).

93. Since Defendants did not provide an opt-out mechanism to Plaintiff during the prerecorded message, Defendants' conduct damaged Plaintiff by forcing him to incur expenses from further phone calls or prerecorded messages to Plaintiff's cellular telephone.
94. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
95. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from employing prerecorded telemarketing calls without an opt-out mechanism.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT V – Telephone Consumer Protection Act – 47 CFR § 64.1200(c)(2)

96. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
97. Defendants violated regulations of the TCPA including, but not limited to, the following:

No person or entity shall initiate any telephone solicitation to a residential telephone subscriber who has registered his or her telephone number on the national do-not-call registry of persons who do not wish to receive telephone solicitations that is maintained by the Federal Government.

47 CFR § 64.1200(c)(2).

The rules set forth in paragraph (c) and (d) of this section [47 CFR § 64.1200] are applicable to any person or entity making telephone solicitations or telemarketing calls to wireless telephone numbers to the extent described in the Commission's Report and Order, CG Docket No. 02-278, FCC 03-153, "Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991."

47 CFR § 64.1200(e).

98. Since Defendants called Plaintiff's cellular telephone while his telephone was on the National Do Not Call Registry, Defendants' conduct damaged Plaintiff by forcing him to incur expenses from further phone calls to Plaintiff's cellular telephone.
99. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
100. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing numbers on the Do Not Call registry.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT VI – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(1)

101. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
102. Defendants violated regulations of the TCPA including, but not limited to, the

following:

Written policy. Persons or entities making calls for telemarketing purposes must have a written policy, available upon demand, for maintaining a do-not-call list.

47 CFR § 64.1200(d)(1).

103. Defendants do not maintain a do-not-call list. See *Jenkins v. National Grid USA et al.*
104. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
105. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing without a do-not-call policy.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT VII – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(2)

106. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
107. Defendants violated regulations of the TCPA including, but not limited to, the following:

Training of personnel engaged in telemarketing. Personnel engaged in any aspect of telemarketing must be informed and trained in the existence and use of the do-not-call list.

47 CFR § 64.1200(d)(2).

108. Defendants do not maintain a do-not-call list.
109. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
110. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing without informed and trained personnel.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT VIII – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(3)

111. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
112. Defendants violated regulations of the TCPA including, but not limited to, the following:

Recording, disclosure of do-not-call requests. If a person or entity making a call for telemarketing purposes (or on whose behalf such a call is made) receives a request from a residential telephone subscriber not to receive calls from that person or entity, the person or entity must record the request and place the subscriber's name, if provided, and telephone number on the do-not-call list at the time the request is made. Persons or entities making calls for telemarketing purposes (or on whose behalf such calls are made) must honor a residential subscriber's do-not-call request within a reasonable time from the date such request is made. This period may not exceed thirty days from the date of such request. If such requests are recorded or maintained by a party other than the

person or entity on whose behalf the telemarketing call is made, the person or entity on whose behalf the telemarketing call is made will be liable for any failures to honor the do-not-call request. A person or entity making a call for telemarketing purposes must obtain a consumer's prior express permission to share or forward the consumer's request not to be called to a party other than the person or entity on whose behalf a telemarketing call is made or an affiliated entity.

47 CFR § 64.1200(d)(3).

113. Defendants refused to record or honor Plaintiff's repeated do not call requests.
114. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
115. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from calling calling consumers who place do-not-call requests.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT IX – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(4)

116. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
117. Defendants violated regulations of the TCPA including, but not limited to, the following:

Identification of sellers and telemarketers. A person or entity making a call for telemarketing purposes must provide the called party with the name of the

individual caller, the name of the person or entity on whose behalf the call is being made, and a telephone number or address at which the person or entity may be contacted.

47 CFR § 64.1200(d)(4).

118. Since Defendants did not identify the name of the individual caller, Defendants' conduct damaged Plaintiff by forcing him to incur expenses to determine who called Plaintiff's cellular telephone.
119. Since Defendants did not identify the address of the caller, Defendants' conduct damaged Plaintiff by forcing him to incur expenses to determine who called Plaintiff's cellular telephone.
120. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
121. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing without proper disclosures.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT X – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(5)

122. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

123. Defendants violated regulations of the TCPA including, but not limited to, the following:

Affiliated persons or entities. In the absence of a specific request by the subscriber to the contrary, a residential subscriber's do-not-call request shall apply to the particular business entity making the call (or on whose behalf a call is made), and will not apply to affiliated entities unless the consumer reasonably would expect them to be included given the identification of the caller and the product being advertised.

47 CFR § 64.1200(d)(5).

124. Defendants did not apply Plaintiff's do not call requests to the particular business entity making the calls.
125. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
126. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from refusing to apply do-not-call requests across all Defendant's business entities.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XI – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(6)

127. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
128. Defendants violated regulations of the TCPA including, but not limited to, the

following:

Maintenance of do-not-call lists. A person or entity making calls for telemarketing purposes must maintain a record of a consumer's request not to receive further telemarketing calls. A do-not-call request must be honored for 5 years from the time the request is made.

47 CFR § 64.1200(d)(6).

129. Defendants did not maintain Plaintiff's do not call requests because Defendants refuse to honor Plaintiff's requests.
130. As a result of Defendants' actions, under 47 U.S.C. § 227(b)(3), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
131. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(b)(3) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(b)(3);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(b)(3);
- 3) Injunctive Relief to restrain and enjoin Defendant from conducting telemarketing without maintaining do-not-call lists.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XII – Telephone Consumer Protection Act– 47 U.S.C. § 227(c)(5)

132. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
133. Defendants' violations of the TCPA include, but are not limited to, the following:

Placing more than one telephone call to Plaintiff's cellular phone without consent in violation of the TCPA regulations.

134. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 for each such violation and an injunction prohibiting future conduct in violation of the TCPA.
135. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from calling Plaintiff.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XIII – Telephone Consumer Protection Act – 47 CFR § 64.1200(a)(1)(iii)

136. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
137. Defendants violated regulations of the TCPA including, but not limited to, the following:

No person or entity may use an automatic telephone dialing system or an artificial or prerecorded voice to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call.

47 CFR § 64.1200(a)(1)(iii).

138. Defendants called Plaintiff's cellular telephone with prerecorded voice for years.
139. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 for each such violation and an injunction prohibiting future conduct in violation of the TCPA.

140. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from calling Plaintiff using prerecorded voice.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XIV – Telephone Consumer Protection Act – 47 CFR § 64.1200(a)(2)

141. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

142. Defendants violated regulations of the TCPA including, but not limited to, the following:

No person or entity may initiate, or cause to be initiated, any telephone call that includes or introduces an advertisement or constitutes telemarketing, using an automatic telephone dialing system or an artificial or prerecorded voice, to any of the lines or telephone numbers described in paragraphs (a)(1)(i) through (iii) of this section.

47 CFR § 64.1200(a)(2).

143. Defendants damaged Plaintiff by calling his cellular phone with prerecorded telemarketing messages.
144. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 for each such violation and an injunction prohibiting future conduct in violation of the TCPA.
145. Since Defendants' violations were committed willfully and knowingly, Plaintiff

requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from calling Plaintiff with prerecorded telemarketing messages.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XV – Telephone Consumer Protection Act – 47 CFR § 64.1200(b)(3)

146. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

147. Defendants violated regulations of the TCPA including, but not limited to, the following:

In every case where the artificial or prerecorded voice telephone message includes or introduces an advertisement or constitutes telemarketing and is delivered to a residential telephone line or any of the lines or telephone numbers described in paragraphs (a)(1)(i) through (iii), provide an automated, interactive voice- and/or key press-activated opt-out mechanism for the called person to make a do-not-call request.

47 CFR § 64.1200(b)(3).

148. Since Defendants did not provide an opt-out mechanism to Plaintiff during the prerecorded message, Defendants' conduct damaged Plaintiff by forcing him to incur expenses from further phone calls to Plaintiff's cellular telephone.

149. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 for each such violation and an injunction prohibiting future conduct in violation of the TCPA.

150. Since Defendants' violations were committed willfully and knowingly, Plaintiff

requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(a)
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from employing prerecorded telemarketing calls without an opt-out mechanism.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XVI – Telephone Consumer Protection Act – 47 CFR § 64.1200(c)(2)

151. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

152. Defendants violated regulations of the TCPA including, but not limited to, the following:

No person or entity shall initiate any telephone solicitation to a residential telephone subscriber who has registered his or her telephone number on the national do-not-call registry of persons who do not wish to receive telephone solicitations that is maintained by the Federal Government.

47 CFR § 64.1200(c)(2).

The rules set forth in paragraph (c) and (d) of this section [47 CFR § 64.1200] are applicable to any person or entity making telephone solicitations or telemarketing calls to wireless telephone numbers to the extent described in the Commission's Report and Order, CG Docket No. 02-278, FCC 03-153, "Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991."

47 CFR § 64.1200(e).

153. Since Defendants called Plaintiff's cellular telephone while his telephone was on the National Do Not Call Registry, Defendants' conduct damaged Plaintiff by forcing him to incur expenses from further phone calls to Plaintiff's cellular telephone.

154. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to

an award of statutory damages of \$500.00 for each such violation and an injunction prohibiting future conduct in violation of the TCPA.

155. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing telephones on the Do Not Call Registry.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XVII – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(1)

156. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

157. Defendants violated regulations of the TCPA including, but not limited to, the following:

Written policy. Persons or entities making calls for telemarketing purposes must have a written policy, available upon demand, for maintaining a do-not-call list.

47 CFR § 64.1200(d)(1).

158. Defendants do not maintain a do-not-call list.
159. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
160. Since Defendants' violations were committed willfully and knowingly, Plaintiff

requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing without a written do-not-call policy.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XVIII – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(2)

161. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

162. Defendants violated regulations of the TCPA including, but not limited to, the following:

Training of personnel engaged in telemarketing. Personnel engaged in any aspect of telemarketing must be informed and trained in the existence and use of the do-not-call list.

47 CFR § 64.1200(d)(2).

163. Defendants do not maintain a do-not-call list.

164. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.

165. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing without informed and trained personnel.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XIX – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(3)

166. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

167. Defendants violated regulations of the TCPA including, but not limited to, the following:

Recording, disclosure of do-not-call requests. If a person or entity making a call for telemarketing purposes (or on whose behalf such a call is made) receives a request from a residential telephone subscriber not to receive calls from that person or entity, the person or entity must record the request and place the subscriber's name, if provided, and telephone number on the do-not-call list at the time the request is made. Persons or entities making calls for telemarketing purposes (or on whose behalf such calls are made) must honor a residential subscriber's do-not-call request within a reasonable time from the date such request is made. This period may not exceed thirty days from the date of such request. If such requests are recorded or maintained by a party other than the person or entity on whose behalf the telemarketing call is made, the person or entity on whose behalf the telemarketing call is made will be liable for any failures to honor the do-not-call request. A person or entity making a call for telemarketing purposes must obtain a consumer's prior express permission to share or forward the consumer's request not to be called to a party other than the person or entity on whose behalf a telemarketing call is made or an affiliated entity.

47 CFR § 64.1200(d)(3).

168. Defendants refused to record or honor Plaintiff's repeated do not call requests.

169. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.

170. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from calling consumers who place do-not-call requests.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XX – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(4)

171. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

172. Defendants violated regulations of the TCPA including, but not limited to, the following:

Identification of sellers and telemarketers. A person or entity making a call for telemarketing purposes must provide the called party with the name of the individual caller, the name of the person or entity on whose behalf the call is being made, and a telephone number or address at which the person or entity may be contacted.

47 CFR § 64.1200(d)(4).

173. Since Defendants did not identify the name of the individual caller, Defendants' conduct damaged Plaintiff by forcing him to incur expenses to determine who called Plaintiff's cellular telephone.
174. Since Defendants did not identify the address of the caller, Defendants' conduct damaged Plaintiff by forcing him to incur expenses to determine who called Plaintiff's cellular telephone.

175. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 "for each such violation" and an injunction prohibiting future conduct in violation of the TCPA.
176. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from telemarketing without making proper disclosures.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XXI – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(5)

177. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.
178. Defendants violated regulations of the TCPA including, but not limited to, the following:
- Affiliated persons or entities. In the absence of a specific request by the subscriber to the contrary, a residential subscriber's do-not-call request shall apply to the particular business entity making the call (or on whose behalf a call is made), and will not apply to affiliated entities unless the consumer reasonably would expect them to be included given the identification of the caller and the product being advertised.
- 47 CFR § 64.1200(d)(5).
179. Defendants did not apply Plaintiff's do not call requests to the particular business entity making the calls.
180. As a result of Defendants' actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to

an award of statutory damages of \$500.00 “for each such violation” and an injunction prohibiting future conduct in violation of the TCPA.

181. Since Defendants’ violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from refusing to apply do-not-call requests across all of Defendant’s business entities.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

COUNT XXII – Telephone Consumer Protection Act – 47 CFR § 64.1200(d)(6)

182. The acts of the Defendants constitute violations of the Telephone Consumer Protection Act.

183. Defendants violated regulations of the TCPA including, but not limited to, the following:

Maintenance of do-not-call lists. A person or entity making calls for telemarketing purposes must maintain a record of a consumer’s request not to receive further telemarketing calls. A do-not-call request must be honored for 5 years from the time the request is made.

47 CFR § 64.1200(d)(6).

184. Defendants did not maintain Plaintiff’s do not call requests because Defendants refuse to honor Plaintiff’s requests.
185. As a result of Defendants’ actions, under 47 U.S.C. § 227(c)(5), Plaintiff is entitled to an award of statutory damages of \$500.00 “for each such violation” and an injunction prohibiting future conduct in violation of the TCPA.

186. Since Defendants' violations were committed willfully and knowingly, Plaintiff requests an award of statutory damages of \$1,500.00 under 47 U.S.C. § 227(c)(5) for each such violation.

Wherefore, the Plaintiff requests judgment against each Defendant for

- 1) Actual Damages pursuant to 47 U.S.C. § 227(c)(5);
- 2) Statutory Damages in the amount of \$1,500 for each such violation pursuant to 47 U.S.C. § 227(c)(5);
- 3) Injunctive Relief to restrain and enjoin Defendant from conducting telemarketing without maintaining do-not-call lists.
- 4) Referral to the Rhode Island Attorney General for prosecution under 47 U.S.C. § 227(g).
- 5) Such other relief as the Court may deem just and appropriate.

The Plaintiff,
Christopher Laccinole

/s/ Christopher M. Laccinole
Christopher M. Laccinole
23 Othmar St.
Narragansett, RI 02882
chrislaccinole@gmail.com

JURY DEMAND

The Plaintiff demands a trial by jury on each and every count.

/s/ Christopher M. Laccinole

Christopher M. Laccinole

June 30, 2015

National Grid

PO Box 960

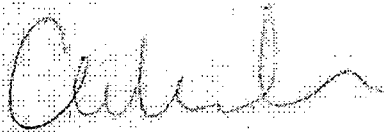
Northborough MA 01532-0960

Dear National Grid official,

I recently made several payments on my account and I am asking for an updated statement on my account so that I can see what my next due date is, and what the next payment amount should be. I made two payments last month and I think it messed up my payment arrangement.

Please don't call me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Laccinole".

Chris Laccinole

17 Richard Smith Road

Narragansett, RI 02882

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(Expected Delivery Day)

(Thursday 07/02/2015)

Certified 1 \$3.45

((USPS Certified Mail #)

(70150640000440417133)

Return 1 \$2.80

Receipt

((USPS Return Receipt #)

(9590940301335077816312)

First-Class 1 \$0.49

Mail

Letter

(Domestic)

(NORTHBOROUGH, MA 01532)

(Weight: 0 Lb 0.50 Oz)

(Expected Delivery Day)

(Thursday 07/02/2015)

Certified 1 \$3.45

((USPS Certified Mail #)

(70150640000440417126)

Return 1 \$2.80

Receipt

((USPS Return Receipt #)

(9590940301335077816329)

Total \$13.48

Debit Card Remit'd \$13.48

(Card Name: Debit Card)

(Account #: XXXXXXXXXX5354)

(Approval #: 747345)

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(Debit Card Purchase: \$13.48)

(Cash Back: \$0.00)

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PS Form 3800, April 2015 PSN 7530-02-000-9053 See Reverse for Instructions

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

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National Grid

P.O. Box 960

Northborough MA 01532-0960



9590 9403 0133 5077 8163 29

2. Article Number (Transfer from service label)

7015 0640 0004 4041 7126

PS Form 3811, April 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Charles A. [Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

☐ Adult Signature ☐ Priority Mail Express®☐ Adult Signature Restricted Delivery ☐ Registered Mail™☒ Certified Mail® ☐ Registered Mail Restricted Delivery☐ Certified Mail Restricted Delivery ☐ Return Receipt for Merchandise☐ Collect on Delivery ☐ Signature Confirmation™☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation Restricted Delivery

iii Restricted Delivery

Domestic Return Receipt

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November 29, 2013

National Grid

PO Box 960

Northborough MA 01532-0960

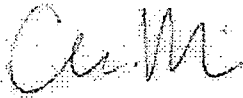
Dear National Grid official,

I recently made several payments on my account and I am asking for an updated statement on my account so that I can see what my next due date is, and what the next payment amount should be.

I also want to let you know that there is a utility pole directly opposite my house that is leaning over at a 20 degree angle. It needs to be replaced before the next big storm occurs.

Please don't call me.

Sincerely,



Chris Laccinole

17 Richard Smith Road

Narragansett, RI 02882

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Northborough MA 01532-0960

PS Form 3800, August 2005 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X <i>[Signature]</i></p>	
<p>1. Article Addressed to:</p> <p>National Grid PO BOX 960 Northborough MA 01532-0960</p>		<p>B. Received by (Printed Name) KEED</p> <p>C. Date of Delivery 12/2</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7012 0470 0001 5313 7966</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>PS Form 3811, February 2004</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

Domestic Return Receipt 102563-02-M-1540

May 4, 2018

National Grid

PO Box 960

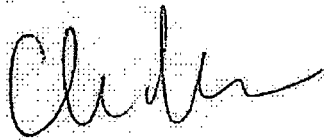
Northborough MA 01532-0960

Dear National Grid,

Please don't call me.

Please send me an updated billing statement.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Laccinole". The signature is fluid and cursive, with the first name "Chris" being more prominent than the last name "Laccinole".

Chris Laccinole

17 Richard Smith Road

Narragansett, RI 02882

Account 1318609050

WAKEFIELD
551 KINGSTOWN RD
WAKEFIELD
RI

02879-9994
4382600880

05/11/2018 (800)275-8777 10:30 AM

Product Description	Sale Qty	Final Price
First-Class Mail Letter	1	\$0.50

(Domestic)
(NORTHBOROUGH, MA 01532)
(Weight: 0 Lb 0.40 Oz)
(Estimated Delivery Date)
(Monday 05/14/2018)
Certified 1 \$3.45
(@USPS Certified Mail #)
(70150640000408025950)
Return Receipt 1 \$2.75
(@USPS Return Receipt #)
(9590940218096074861736)

Total \$6.70

Credit Card Remitd \$6.70

(Card Name: VISA)
(Account #: XXXXXX XXXX3708)
(Approval #: 015580)
(Transaction #: 642)
(Entry Mode: Chip)
(AID: A0000000031010)
(Application Label: VISA CREDIT)
(PIN: PIN Not Required)
(Cryptogram: A6D6482C13CDF731)
(ARC: 00)
(CVR: 1E0300)
(IAD: 06010A03602002)
(TSI: F800)
(TVR: 0000008000)

Text your tracking number to 28777
(2USPS) to get the latest status.
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Refund request for Adult Signature &
Restricted Delivery must be made in
person at a USPS Retail Location.

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Refunds for guaranteed services only
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NORTHBOROUGH, MA 01532

Certified Mail Fee \$3.45
Extra Services & Fees (check box, add fees as applicable)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00
Postage \$0.50
Total Postage and Fees \$6.70

Send To
National Grid
PO Box 960
Northborough, MA 01532-0960
PS Form 3800, April 2015 PSN 7530-02-000-9053 See Reverse for Instructions

05/11/2018
0885 13 02879
USPS

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

National Grid
PO Box 960
Northborough, MA 01532-0960



9590 9402 1809 6074 8617 36

2. Article Number (Transfer from service label)

7015 0640 0004 0802 5950

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature *May 11 2018*
X AMO - NATIONAL GRID
B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

December 18, 2018

National Grid

PO Box 960

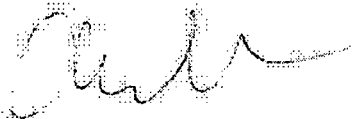
Northborough MA 01532-0960

Dear National Grid,

Please don't call me.

Please send me an updated billing statement.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris Laccinole", with a stylized flourish at the end.

Chris Laccinole

17 Richard Smith Road

Narragansett, RI 02882

Account 1318609050

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> <i>V. Perry</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>National Grid PO Box 960 Northborough MA 01532-0960</p>		<p>B. Received by (Printed Name) <i>V. Perry</i> C. Date of Delivery <i>12-20-18</i></p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 1130 0000 5140 0922</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

U.S. Postal Service CERTIFIED MAIL® RECEIPT	
<p>Domestic Mail Only</p> <p>For delivery information, visit our website at www.usps.com</p> <p>NORTHBOROUGH, MA 01532</p>	
<p>Certified Mail Fee \$3.45</p>	
<p>Extra Services & Fees (check box, add fee as appropriate)</p> <p><input type="checkbox"/> Return Receipt (hardcopy) \$0.00</p> <p><input type="checkbox"/> Return Receipt (electronic) \$0.00</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery \$0.00</p> <p><input type="checkbox"/> Adult Signature Required \$0.00</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery \$0.00</p>	
<p>Postage \$0.50</p>	
<p>Total Postage and Fees \$6.70</p>	
<p>Postmark Here</p> <p>12/18/2018</p>	
<p>Shipped to National Grid Street and Apt. No., or PO Box No. PO Box 960 City, State, ZIP+4® Northborough MA 01532-0960</p>	
<p>PS Form 3800, April 2015 PSN 7530-02-000-9042 See Reverse for Instructions</p>	

=====			First-Class 1 \$0.71	PM 1-Day 1 \$7.25
=====			Mail Letter	(Domestic)
=====			(Domestic)	(NEWTON CENTER, MA 02459)
=====			(CHESTER, PA 19016)	(Weight: 1 Lb 3.60 Oz)
=====			(Weight: 0 Lb 1.10 Oz)	(Expected Delivery Date)
=====			(Estimated Delivery Date)	(Wednesday 12/19/2018)
=====			(Thursday 12/20/2018)	Certified 1 \$3.45
=====			Certified 1 \$3.45	(@USPS Certified Mail #)
=====			(7017268000023241841)	(70181130000051400946)
=====			Return 1 \$2.75	Return 1 \$2.75
=====			Receipt	(@USPS Return Receipt #)
=====			(9590940238768060228758)	(9590940238768060228581)
=====			Total	\$75.30
=====			Product Sale Final	Debit Card Remit'd \$75.30
=====			Description Qty Price	(Card Name: VISA)
=====			First-Class 1 \$0.71	(Account #: XXXXXXXXXX5354)
=====			Mail Letter	(Approval #:)
=====			(Domestic)	(Transaction #: 177)
=====			(NORTHBOROUGH, MA 01532)	(Receipt #: 001472)
=====			(Weight: 0 Lb 0.40 Oz)	(Debit Card Purchase: \$75.30)
=====			(Estimated Delivery Date)	(Cash Back: \$0.00)
=====			(Thursday 12/20/2018)	(AID: A0000000980840 Chip)
=====			Certified 1 \$3.45	(AL: US DEBIT)
=====			(@USPS Certified Mail #)	(PIN: Verified)
=====			(70181130000051400922)	
=====			Return 1 \$2.75	
=====			Receipt	
=====			(@USPS Return Receipt #)	
=====			(9590940218096074650576)	
=====			First-Class 1 \$0.50	
=====			Mail Letter	
=====			(Domestic)	
=====			(BOSTON, MA 02108)	
=====			(Weight: 0 Lb 0.40 Oz)	
=====			(Estimated Delivery Date)	
=====			(Thursday 12/20/2018)	
=====			Certified 1 \$3.45	
=====			(@USPS Certified Mail #)	
=====			(70181130000051400915)	
=====			Return 1 \$2.75	
=====			Receipt	
=====			(@USPS Return Receipt #)	
=====			(9590940238768060228741)	
=====			First-Class 1 \$0.50	
=====			Mail Letter	
=====			(Domestic)	
=====			(ATLANTA, GA 30374)	
=====			(Weight: 0 Lb 0.40 Oz)	
=====			(Estimated Delivery Date)	
=====			(Friday 12/21/2018)	
=====			Certified 1 \$3.45	
=====			(@USPS Certified Mail #)	
=====			(70181130000051400939)	
=====			Return 1 \$2.75	
=====			Receipt	
=====			(@USPS Return Receipt #)	
=====			(9590940238768060228567)	
=====			First-Class 1 \$1.42	
=====			Mail Large Envelope	
=====			(Domestic)	
=====			(NEWTON CENTER, MA 02459)	
=====			(Weight: 0 Lb 2.60 Oz)	
=====			(Estimated Delivery Date)	
=====			(Thursday 12/20/2018)	
=====			Certified 1 \$3.45	
=====			(@USPS Certified Mail #)	
=====			(70180360000214320311)	
=====			Return 1 \$2.75	
=====			Receipt	
=====			(@USPS Return Receipt #)	
=====			(9590940238768060228598)	
=====			First-Class 1 \$0.71	
=====			Mail Letter	
=====			(Domestic)	
=====			(LA JOLLA, CA 92037)	
=====			(Weight: 0 Lb 0.40 Oz)	
=====			(Estimated Delivery Date)	
=====			(Friday 12/21/2018)	
=====			Certified 1 \$3.45	
=====			(@USPS Certified Mail #)	
=====			(7017268000023252588)	
=====			Return 1 \$2.75	
=====			Receipt	
=====			(@USPS Return Receipt #)	
=====			(9590940238768060228765)	
=====			12/18/2018 (800)275-8777 4:38 PM	
=====			WAKEFIELD	
=====			551 KINGSTOWN RD	
=====			WAKEFIELD	
=====			RI	
=====			02879-9994	
=====			4382600880	

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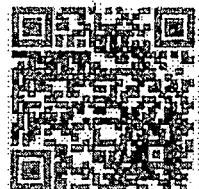
Note: Priority Mail Express refund
restrictions in effect for mailing
dates Dec. 22 - 25

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or scan this code with
your mobile device:



or call 1-800-410-7420.

1/4/2019

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USPS Tracking®FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)**Track Another Package +****Tracking Number:** 70181130000051400922

Remove X

On Time**Expected Delivery on****THURSDAY****20**DECEMBER
2018 ⓘ

by

8:00pm ⓘ**✓ Delivered**December 20, 2018 at 7:27 am
Delivered, To Agent
NORTHBOROUGH, MA 01532**Get Updates** ✓

Feedback

Text & Email Updates**Tracking History****Product Information****See Less** ^**Can't find what you're looking for?**

1/4/2019

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Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Feedback

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- Set up email and text alerts so you don't need to enter tracking numbers.
- Enter USPS Delivery Instructions™ for your mail carrier.

Sign Up

([https://reg.usps.com/entreg/RegistrationAction_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=USpsTools&appURL=https%3A%2F%2Ftools.usps.com%2Fgo)

***NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.**

January 4, 2020


National Grid
PO Box 960
Northborough MA 01532-0960

Dear National Grid,

Please don't call me.

Please send me an updated billing statement.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris", with a stylized flourish at the end.

Chris Laccinole

17 Richard Smith Road

Narragansett, RI 02882

Account 1318609050

NARRAGANSETT
15 MEMORIAL SQ
NARRAGANSETT, RI 02882-3391
430101-0882
(800)275-8777
01/04/2020 01:00 PM

Product	Qty	Unit Price	Price
First-Class Mail® Letter (Domestic) (NORTHBOROUGH, MA 01532) (Weight: 0 Lb 0.60 Oz) (Estimated Delivery Date) (Monday 01/06/2020)	1	\$0.55	\$0.55
Certified (USPS Certified Mail #) (70190140000033579041)		\$3.50	
Return Receipt (USPS Return Receipt #) (9590940253979189775811)		\$2.80	
First-Class Mail® Letter (Domestic) (NORFOLK, VA 23502) (Weight: 0 Lb 0.60 Oz) (Estimated Delivery Date) (Tuesday 01/07/2020)	1	\$0.55	\$0.55
Certified (USPS Certified Mail #) (70190140000033579027)		\$3.50	
Return Receipt (USPS Return Receipt #) (9590940253979189776627)		\$2.80	
Total:			\$13.70

Credit Card Remit'd \$13.70
(Card Name: VISA)
(Account #: XXXXXXXXXX0629)
(Approval #: 011150)
(Transaction #: 858)
(AID: A0000000031010 Chip)
(AL: VISA CREDIT)
(PIN: Not Required)

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NORTHBOROUGH, MA 01532

Certified Mail Fee \$3.50

Extra Services & Fees (check box, add fee to postage):
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.55
Total Postage and Fees \$6.85

Sent To: National Grid
Street and Apt. No., or PO Box No.: PO Box 960
City, State, ZIP+4®: Northborough MA 01532-0960

PS Form 3800, April 2015 PSN 7530-02-000-9053 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

National Grid
PO Box 960
Northborough MA 01532-0960



9590 9402 5397 9189 7758 11

2. Article Number (Transfer from service label)

7019 0140 0000 3357 9041

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature]

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Mail Restricted Delivery
- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

USPS Tracking®

FAQs >

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Track Packages
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automated notifications on your packages

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Tracking Number: 70190140000033579041

Remove X

Your item has been delivered to an agent at 7:02 am on January 7, 2020 in NORTHBOROUGH, MA 01532.

✓ Delivered

January 7, 2020 at 7:02 am
Delivered, To Agent
NORTHBOROUGH, MA 01532

Get Updates ▾

Text & Email Updates ▾

Tracking History ▾

Product Information ▾

See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

Feedback

July 24, 2020

National Grid

PO Box 960


Northborough MA 01532-0960

Dear National Grid,

Please don't call me.

Please send me an updated billing statement.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris", written over a light background.

Chris Laccinole

23 Othmar St.

Narragansett, RI 02882

Account 3812151048

Credit Card Remitd \$6.95
Card Name:VISA
Account #:XXXXXXX0629
Approval #:03699D
Transaction #:476
ATD:A0000000031010 Chip
AL:VISA CREDIT
PTN:Not Required

Due to limited transportation
availability as a result of
nationwide COVID-19 impacts
package delivery times may be
extended. Priority Mail Express®
service will not change.

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

Text your tracking number to 28777
(2USPS) to get the latest status.
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apply. You may also visit www.usps.com
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Northborough, MA 01532

PROHIBITED USE

Certified Mail Fee \$3.55

Extra Services & Fees (check box and fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.55

Total Postage and Fees \$6.95

Send To
National Grid
 Street and Apt. No., or PO Box No.
PO BOX 960
 City, State, ZIP+4®
Northborough MA 01532-0960

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

0880 75
 Postmark Here
 MAILED 04/20/20
 APR 24 2020
 WAKEFIELD MA 02839

10/31/21, 1:50 PM

USPS.com® - USPS Tracking® Results

USPS Tracking®**FAQs** >**Track Another Package** +**Tracking Number:** 70192280000049475000

Remove X

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

Reminder to Schedule Redelivery of your item**Get Updates** ∨

Feedback

Text & Email Updates**Tracking History**

Reminder to Schedule Redelivery of your item

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

July 27, 2020, 7:04 am

Available for Pickup

NORTHBOROUGH, MA 01532

July 27, 2020, 7:02 am

Arrived at Post Office

NORTHBOROUGH, MA 01532

July 26, 2020, 11:52 pm

Departed USPS Regional Facility

SHREWSBURY MA DISTRIBUTION CENTER

July 26, 2020

In Transit to Next Facility

July 25, 2020, 7:35 pm

Arrived at USPS Regional Facility

SHREWSBURY MA DISTRIBUTION CENTER

July 24, 2020, 11:07 pm

Departed USPS Regional Origin Facility

PROVIDENCE RI DISTRIBUTION CENTER

July 24, 2020, 9:51 pm

Arrived at USPS Regional Origin Facility

PROVIDENCE RI DISTRIBUTION CENTER

July 24, 2020, 6:19 pm

Departed Post Office

WAKEFIELD, RI 02879

July 24, 2020, 4:40 pm

USPS in possession of item

WAKEFIELD, RI 02879

Feedback

Product Information

See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

10/31/21, 1:50 PM

USPS.com® - USPS Tracking® Results

FAQs

Feedback

September 16, 2020

National Grid

PO Box 960

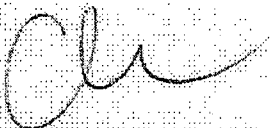
Northborough MA 01532-0960

Dear National Grid,

Please don't call me.

Please send me an updated billing statement.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris", with a stylized flourish at the end.

Chris Laccinole

23 Othmar St.

Narragansett, RI 02882

Accounts 3812151048, 2646809067

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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Northborough, MA 01532

OFFICIAL USE

Certified Mail Fee	\$3.55
Extra Services & Fees (check box, add fee to Certified Mail fee)	\$7.85
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$1.00
Total Postage and Fees	\$7.40

Postmark: SEP 16 0880

9910 National Grid
 Street and Apt. No. or PO Box No.
 PO BOX 960
 City, State, ZIP+4®
 Northborough, MA 01532-0960

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>National Grid PO BOX 960 Northborough, MA 01532-0960</p> <p>9590 9402 5970 0062 0750 25</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Mail Restricted Delivery (00)</p> <p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>
<p>2. Article Number (Transfer from service label)</p> <p>7020 1810 0001 1106 1340</p>	
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt



WAKEFIELD
551 KINGSTOWN RD
WAKEFIELD, RI 02879-9994
(800)275-8777

09/16/2020 04:54 PM

Product	Qty	Unit Price	Price
First-Class Mail® Large Envelope	1		\$1.00

Saint Paul, MN 55127
Weight: 0 Lb 0.80 Oz
Estimated Delivery Date:
Monday 09/21/2020

Certified Mail® Tracking #:		\$3.55
-----------------------------	--	--------

7018309000075194316

Return Receipt Tracking #:		\$2.85
----------------------------	--	--------

9590940259780062687886

Total		\$7.40
-------	--	--------

First-Class Mail® Large Envelope	1		\$1.00
----------------------------------	---	--	--------

Norfolk, VA 23502
Weight: 0 Lb 0.90 Oz
Estimated Delivery Date:
Monday 09/21/2020

Certified Mail® Tracking #:		\$3.55
-----------------------------	--	--------

70201810000111061333

Return Receipt Tracking #:		\$2.85
----------------------------	--	--------

9590940259700062075032

Total		\$7.40
-------	--	--------

First-Class Mail® Large Envelope	1		\$1.00
----------------------------------	---	--	--------

Northborough, MA 01532
Weight: 0 Lb 0.30 Oz
Estimated Delivery Date:
Saturday 09/19/2020

Certified Mail® Tracking #:		\$3.55
-----------------------------	--	--------

70201810000111061340

Return Receipt Tracking #:		\$2.85
----------------------------	--	--------

9590940259700062075025

Total		\$7.40
-------	--	--------

First-Class Mail® Large Envelope	1		\$1.40
----------------------------------	---	--	--------

Providence, RI 02903
Weight: 0 Lb 2.80 Oz
Estimated Delivery Date:
Saturday 09/19/2020

Certified Mail® Tracking #:		\$3.55
-----------------------------	--	--------

70200099000193355686

Return Receipt Tracking #:		\$2.85
----------------------------	--	--------

9590940259700062075018

Total		\$7.80
-------	--	--------

PM Express 1-Day	1		\$27.55
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Wakefield, RI 02879
Weight: 2 Lb 4.10 Oz
Signature Waiver
Scheduled Delivery Date:
Thursday 09/17/2020 12:00 PM
Money Back Guarantee
Tracking #:

EJ38314856US

Insurance		\$0.00
-----------	--	--------

Up to \$100.00 included

Total		\$27.55
-------	--	---------

Grand Total: \$57.55

Credit Card Remitd \$57.55
Card Name: VISA
Account #: XXXXXXXXXX0629
Approval #: 00720D
Transaction #: 731
AID: A0000000031010 Chip
AL: VISA CREDIT
PIN: Not Required

Due to limited transportation availability as a result of nationwide COVID-19 impacts package delivery times may be extended. Priority Mail Express® service will not change.

Includes up to \$100 insurance

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

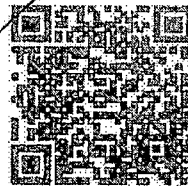
Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm>

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Preview your Mail
Track your Packages
Sign up for FREE @
www.informedelivery.com

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to:
<https://postalexperience.com/Pos>
840-5028-0336-003-00058-19187-02
or scan this code with your mobile device.



or call 1-800-410-7420.

UFN: 438260-0880
Receipt #: 840-50280336-3-5819187-2
Clerk: 54

10/3/21, 12:32 PM

USPS.com® - USPS Tracking® Results

USPS Tracking®[FAQs >](#)**Track Another Package +****Tracking Number:** 70201810000111061340

Remove X

Your item has been delivered and is available at a PO Box at 8:03 am on September 18, 2020 in NORTHBOROUGH, MA 01532.

✓ Delivered, PO Box

September 18, 2020 at 8:03 am
NORTHBOROUGH, MA 01532

Feedback

Get Updates ✓

Text & Email Updates

✓

Tracking History

^

September 18, 2020, 8:03 am

Delivered, PO Box

NORTHBOROUGH, MA 01532

Your item has been delivered and is available at a PO Box at 8:03 am on September 18, 2020 in NORTHBOROUGH, MA 01532.

September 18, 2020, 6:21 am

Available for Pickup

NORTHBOROUGH, MA 01532

10/3/21, 12:32 PM

USPS.com® - USPS Tracking® Results

September 18, 2020, 6:20 am
Arrived at Post Office
NORTHBOROUGH, MA 01532

September 17, 2020, 11:34 pm
Departed USPS Regional Facility
SHREWSBURY MA DISTRIBUTION CENTER

September 17, 2020, 10:27 am
Arrived at USPS Regional Facility
SHREWSBURY MA DISTRIBUTION CENTER

September 16, 2020, 10:11 pm
Arrived at USPS Regional Origin Facility
PROVIDENCE RI DISTRIBUTION CENTER

September 16, 2020, 5:47 pm
Departed Post Office
WAKEFIELD, RI 02879

September 16, 2020, 4:45 pm
USPS in possession of item
WAKEFIELD, RI 02879

Feedback

Product Information

See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs